

REMARKS

The Examiner rejected claims 1, 2, and 4 under 35 U.S.C. 103(a) as being unpatentable over Ehrlich in view of Valeri. The Examiner states that Ehrlich discloses writing a servo pattern with an offline servo writer. The Applicant respectfully disagrees with this contention.

Fig. 12 of Ehrlich provides a general flow of the servo writing process disclosed in this reference. As shown in Fig. 12, the initial steps are to receive mechanical parts and then assemble and test the hard drive. Initial reference bursts are written into the drive with the servo writer. As the Applicant understands it, the servo writer utilizes the components of the hard drive including the heads of the drive. This is to be distinguished from claim 1 which has been amended to recite writing a reference servo pattern with a plurality of heads of an offline servo writer. The heads of the offline writer are different from the heads in the drive. The offline servo writer is shown in Fig. 4 and discussed in the accompanying pages 8 through 10 of the above entitled application. The Applicant submits that Ehrlich does not disclose or suggest writing a reference servo pattern with the heads of an offline servo writer as disclosed in the claims of the above entitled application. For this reason, the Applicant submits that the combination of Ehrlich and Valeri do not establish a *prima facie* case of obviousness.

In view of the above, it is submitted that the claims are in condition for allowance. Reconsideration of the rejection is requested. Allowance of claims 1 through 7 at an early date is solicited.

Respectfully submitted,
IRELL & MANELLA LLP

Dated: June 30, 2005

Ben Yorks, Reg. No. 33,609

840 Newport Center Drive, Suite 400
Newport Beach, CA 92660
949-760-0991

Certificate of Mailing

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: MS Amendment, Commissioner for Patents, Box 1450, Alexandria, VA 22313-1450 on June 30, 2005.

Susan Langworthy June 30, 2005
Susan Langworthy Date